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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LATIA ALEXANDER, individually as heir
of ISAAH T. WILLIAMS, and in her
capacity as Special Administrator of the
Estate of ISAAH T. WILLIAMS,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of
the State of Nevada; KERRY KUBLA, in his
individual capacity; BRICE CLEMENTS, in
his individual capacity; ALEX GONZALES,
in his individual capacity; RUSSELL
BACKMAN, in his individual capacity;
JAMES ROTHENBURG, in his individual
capacity; JAMES BERTUCCINI, in his
individual capacity; MELANIE O'DANIEL,
in her individual capacity and DOES I-XX,
inclusive,

Defendants.

Case Number:

2:24-cv-00074-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE (THIRD REQUEST)**

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1 Defendants Las Vegas Metropolitan Police Department (“LVMPD”), Kerry Kubla,
2 Brice Clements, Alex Gonzales, Russell Backman, James Rothenburg, James Bertuccini and
3 Melanie O’Daniel (“LVMPD Defendants”), by and through their counsel, Marquis Aurbach,
4 and Plaintiff Latia Alexander, individually as heir of Isaiah T. Williams, and in her capacity
5 as Special Administrator of the Estate of Isaiah T. Williams (“Plaintiff”), by and through her
6 counsel of record, Breeden & Associates, PLLC and Murphy’s Law, PC, hereby agree and
7 jointly stipulate the following:

8 1. The original deadline for filing dispositive motions was April 11, 2025. ECF
9 No. 40.

10 2. On April 7, 2025, the Parties stipulated, and the Court granted, a 21-day
11 extension allowing filing on or before May 2, 2025. ECF No. 47.

12 3. On May 1, 2025, the LVMPD Defendants filed a motion to extend page limit
13 as their summary judgment is 66-pages. (ECF No. 53.)

14 4. The Court granted the LVMPD Defendants’ request to exceed page limits on
15 May 2, 2025. (ECF No. 54.)

16 5. On May 1, 2025, Plaintiff’s counsel and the LVMPD Defendants’ counsel
17 met and conferred on page limits, exhibits, and dispositive motions in general.

18 6. Plaintiff’s lead counsel informed the LVMPD Defendants’ counsel he had
19 pre-planned personal obligations out of the country which limited the time their office had to
20 work on the motion. Plaintiff’s counsel currently has a draft of Plaintiff’s summary
21 judgment motion but feels it needs additional work and an enlargement of the page
22 limitation.

23 7. The LVMPD Defendants agreed to stipulate with Plaintiff to also filing a
24 dispositive page motion that exceeds the 30-page limit.

25 8. Based on this agreement and Plaintiff’s requests, the LVMPD Defendants do
26 not oppose a 14-day extension to file dispositive motions until **May 16, 2025**.

27 9. The LVMPD Defendants will also file their dispositive motion on May 16,
28 2025.

10. This request for an extension of time is not sought for an improper purpose or other purpose of delay.

11. WHEREFORE, the parties respectfully request the dispositive motion deadline be extended to and including **May 16, 2025**.

IT IS SO STIPULATED this 2nd day of May, 2025.

MARQUIS AURBACH

BREEDEN & ASSOCIATES, PLLC

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MURPHY'S LAW

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ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: June 5, 2025